

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

ANDREW DAVIS, individually and on behalf of other similarly situated individuals,

Plaintiff,

v.

TARGET CORPORATION,

Defendant.

Court File No.: 20-cv-00490-DWF-ECW
Honorable Donovan W. Frank

**STIPULATION FOR AMENDMENT
OF THE CAPTION TO REFLECT
NAMED PARTY PLAINTIFFS**

This stipulation is entered into between named Plaintiffs Andrew Davis, Tammy Babbitt, and William Carter, and Target Corporation (the “Parties”) to request that the Court amend the caption of this proceeding so as to reflect that Tammy Babbit and William Carter are the named party Plaintiffs.

WHEREAS this action was commenced by the filing of a complaint on February 11, 2020, in which complaint the named Plaintiff was Andrew Davis, and

WHEREAS the Parties agreed that Davis may withdraw from this lawsuit, without prejudice, and that two new lead plaintiffs, Tammy Babbit and William Carter may be substituted in his place under Rules 15 and 21 of the Federal Rules of Civil Procedure, and

WHEREAS on April 8, 2021, the Court in Pretrial Scheduling Order (Phase One) recognized the Parties’ agreement,

ACCORDINGLY, the Parties, by their undersigned counsel, hereby further agree that the caption in this proceeding should be changed to read as follows for all activity in

this proceeding hereafter:

TAMMY BABBIT AND WILLIAM CARTER, individually and on behalf of other similarly situated individuals,

Plaintiff,

v.

TARGET CORPORATION,

Defendant.

Court File No.: 20-cv-00490-DWF-ECW
Honorable Donovan W. Frank

and further agree that for all proceedings hereafter the named Plaintiffs in this action shall be Tammy Babbit and William Carter, and request that the Clerk of the Court should be directed to so amend the caption in this matter.

PLAINTIFF ANDREW DAVIS

By: s/ Seth R. Lesser
One of Their Attorneys
Seth R. Lesser
Fran Rudich
KLAFTER OLSEN & LESSER LLP
Two International Drive, Suite 350
Rye Brook, New York 10573
(914) 934-2900
www.klafterolsen.com

TARGET CORPORATION

By: s/ Joseph G. Schmitt
One of its Attorneys
David A James
Joseph G Schmitt
Pablo Orozco
Nilan Johnson Lewis PA
250 Marquette Avenue South
Suite 800
Minneapolis, Minnesota 55401

Ph.: 612-305-7500
Fax: 612-305-7501
djames@nilanjohnson.com
jschmitt@nilanjohnson.com
porozco@nilanjohnson.com

The foregoing stipulation is approved, and IT IS SO ORDERED.

Dated: _____